

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
AT&T Corp.)	
)	
Petition for Declaratory Ruling Regarding)	WC Docket No. 03-133
Enhanced Prepaid Calling Card Services)	
)	

MOTION FOR EXTENSION OF TIME

Pursuant to Section 1.46 of the Commission's rules, 47 C.F.R. § 1.46, the Competitive Telecommunications Association ("CompTel") files this Motion requesting the Commission to extend the period for all interested parties to file reply comments in the above-captioned proceeding from July 10, 2003, to July 24, 2003. CompTel submits that this brief extension of time would permit more substantive and complete responses on the complex issues raised in this proceeding. Further, this modest extension would not prejudice any interested parties.

AT&T filed a Petition for Declaratory Ruling on May 15, 2003, which sought a ruling establishing that enhanced prepaid calling card services were interstate communications subject only to interstate access charges when the enhanced services platform that provides stored, non-call-related information to end users is not located in the state in which the calling or called parties are located. The Commission issued a Public

Notice (DA 03-1896) on June 5, 2003, establishing a pleading cycle in which comments must be filed by June 26, 2003, and reply comments by July 10, 2003.

On June 26, the parties filed extensive comments and supporting material, which all parties will need time to analyze. Moreover, the period for preparing reply comments overlaps with the Fourth of July weekend. Consequently, personnel with the expertise necessary to fully address the complex issues raised in the comments will be on scheduled leave and hence unavailable. This is no doubt true not only for CompTel members, but also for other parties that may wish to file reply comments. In light of the substantial volume of comments that have been filed and the complexity of the issues, the short period between June 26 and July 10 is inadequate to permit CompTel members and others to provide the Commission with a full, informed reply. A brief extension of time until July 24, 2003, would greatly facilitate the development of a complete record for the Commission's review.

No prejudice to any party would result from this modest extension. The parties filing comments have had a full month and a half in which to review and respond to AT&T's Petition, which was filed on May 15, 2003. The Commission has previously granted requests for extensions in similar circumstances. *See, e.g., AT&T's Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, Public Notice, 17 FCC Rcd. 24758 (2002); *AT&T's Petition for Declaratory Ruling that AT&T's Phone-to-Phone IP Telephony Services are Exempt from Access Charges*, Public Notice, 17 FCC Rcd. 24471 (2002); *Performance Measurements and Standards for Interstate Special Access Services*, Order, 16 FCC Rcd. 22,117 (2001); *Performance Measurements and Standards for Unbundled Network Elements and Interconnection*, Order, 16 FCC Rcd. 21,428 (2001). CompTel respectfully submits that in this proceeding as well, grant of the additional

time requested would allow all interested parties a meaningful opportunity to respond to issues raised in the comments, and would assist the Commission in reaching its decision based on a complete record.

For all of these reasons, CompTel respectfully requests that the Commission grant its motion for an extension of time until July 24, 2003, to file reply comments in this proceeding.

Respectfully submitted,

_____/s/_____
Jonathan D. Lee
Vice President, Regulatory Affairs
The Competitive Telecommunications
Association
1900 M Street, N. W., Suite 800
Washington, D.C. 20036
Tel: (202) 296-6650

June 26, 2003

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of June, 2003, I caused true and correct copies of the forgoing Motion for Extension of Time to be served on parties listed below by electronic filing.

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

_____/s/_____
Jonathan D. Lee